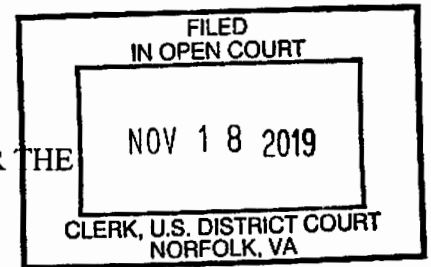


IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA

*Norfolk Division*



UNITED STATES OF AMERICA

v.

JACLYN AMANDA INGE

Defendant.

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CRIMINAL NO. 2:19-CR-90

STATEMENT OF FACTS

The parties stipulate that the allegations in Count Three of the Indictment and the following facts are true and correct, and that had the matter gone to trial the United States would have proven them beyond a reasonable doubt.

1. On August 27, 2017, at a gun show in Richmond, Virginia, the defendant purchased a Jimenez Arms, Model JA Nine, 9mm caliber semi-automatic pistol, bearing serial number 411394, from Black Widow Arms, a licensed firearms dealer. In connection with that purchase, the defendant completed an ATF Form 4473. On the Form 4473, the defendant knowingly lied and intended to deceive the gun shop about at least one material fact about the lawfulness of the sale by checking the box indicating that she was not an unlawful user of, or addicted to, marijuana, when she really was an unlawful user of marijuana and had used the drug daily for several years.

2. On September 10, 2017, at a gun show in Fishersville, Virginia, the defendant purchased a SCCY, Model CPX1, 9mm caliber semi-automatic pistol, bearing serial number 552013, from Elk Creek Arms, a licensed firearms dealer. In connection with that purchase, the defendant completed an ATF Form 4473. On the Form 4473, the defendant knowingly lied and intended to deceive the gun shop about at least one material fact about the lawfulness of the sale

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by checking the box indicating that she was not an unlawful user of, or addicted to, marijuana, when she really was an unlawful user of marijuana and had used the drug daily for several years.

3. The Jiminez Arms and SCCY pistols that the defendant possessed had been manufactured outside of Virginia and had traveled in interstate and foreign commerce.

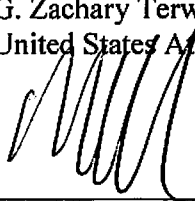
4. The defendant later admitted to ATF agents, "Who hasn't smoked weed?" At least three witness would corroborate that admission and would testify that the defendant had used marijuana for many years—as far back as 2005—and had used marijuana contemporaneous with the two firearm purchases. At the time the defendant possessed the two pistols, she knew that she was an unlawful marijuana user.

5. The acts taken by the defendant, JACLYN AMANDA INGE, in furtherance of the offenses charged in Count Three of the Indictment, including the acts described above, were done willfully and knowingly with the specific intent to violate the law. The defendant acknowledges that the foregoing statement of facts does not describe all of the defendant's conduct relating to the offenses charged in this case, and that it does not identify all of the persons with whom the defendant may have engaged in illegal activities.

Respectfully submitted,

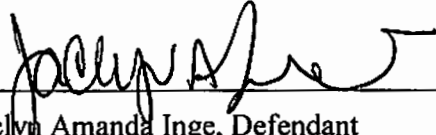
G. Zachary Terwilliger  
United States Attorney

By:


  
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William B. Jackson  
Assistant United States Attorney

for  
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After consulting with my attorney, I hereby stipulate that the above Statement of Facts is true and accurate, and that had the matter proceeded to trial, the United States would have proved the same beyond a reasonable doubt.

  
\_\_\_\_\_  
Jaclyn Amanda Inge, Defendant

I am Jaclyn Amada Inge's attorney. I have carefully reviewed the above Statement of Facts with him. To my knowledge, his decision to stipulate to these facts is an informed and voluntary one.

  
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Eric Leckie, Esq.  
Attorney for Jaclyn Amanda Inge

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